

**EPA Region 7 TSCA §402(c) Renovation and Remodeling
Work Practices Inspection Report**

INSPECTION INFORMATION				
1.	Date of Inspection:	11/09/2012	2.	Inspector: Clark
			<input checked="" type="checkbox"/> NOWCC/SEE <input type="checkbox"/> EPA Region 7	
3.	Inspection Number:	PC 110920121		
4.	Name of Facility/ Company	LHP LLC		
5.	Type of Facility:	<input type="checkbox"/> General Building Contractor/Operative Builder (Renovation Firm, Individual Contractor, etc.) <input type="checkbox"/> Special Trade Contractor (Carpenter, Painter, Drywall worker/lather, "Home Improvement" Contractor, etc.) <input type="checkbox"/> Property Management Firm <input checked="" type="checkbox"/> Landlord		
6.	Location of Inspection:	<input checked="" type="checkbox"/> residence <input type="checkbox"/> common area		
		Description/Name:		
		Street Address: 800 A Street		
		City: Lincoln		
		State: NE	Zip: 68502 (?)	
7.	Mailing Address of Facility:	Point of Contact: MYNOR HERRERA		
		Telephone Number: (402) 440-1117		
		Facility Name: LHP LLC		
		Street Address: 130 North 27th Street #605		
		City: Lincoln		
		State: NE	Zip: 68503	
8.	Inspection was <input checked="" type="checkbox"/> unannounced or <input type="checkbox"/> scheduled in advance			
	If scheduled, when and how? <input type="checkbox"/> by phone on <input type="checkbox"/> by letter on			
9.	Person(s) interviewed during inspection:			
	NAME	TITLE	EMPLOYER	TELEPHONE
	MYNOR Herrera			
	DAVE FIALA	Owner	Self	(402) 440-2470

304-0200

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13.1	with damp cloth and/or mopped?	
	All paint chips and debris collected and sealed in a heavy-duty bag?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Protective sheeting removed, misted before folding, folded dirty side in and either taped shut or sealed in a heavy-duty bag?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Plastic sheeting that isolates contaminated rooms from non-contaminated rooms kept in place until after the cleaning and removal of other sheeting is done?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Plastic sheeting disposed of as a waste?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All personnel, tools, exteriors of waste containers, and other items are free of dust and debris before leaving work area?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Firm carries out all its responsibilities during a renovation, under 40 CFR §745.89(d), pursuant to 40 CFR §745.81(a)(2) including a visual inspection conducted by certified renovator and re-cleaning done if necessary?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Firm carries out all its responsibilities during a renovation, under 40 CFR §745.89(d), pursuant to 40 CFR §745.81(a)(2) including each interior window sill verified as adequately cleaned by certified renovator using a disposable cleaning cloth(s) and compared to the cleaning verification card OR dust clearance samples to be tested?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Firm carries out all its responsibilities during a renovation, under 40 CFR §745.89(d), pursuant to 40 CFR §745.81(a)(2) including each interior floor of the work area verified by certified renovator as adequately cleaned using a disposable cleaning cloth(s) and compared to the cleaning verification card OR dust clearance samples to be tested?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Firm carries out all its responsibilities during a renovation, under 40 CFR §745.89(d), pursuant to 40 CFR §745.81(a)(2) including work signs only removed once the interior work area passes a post-renovation cleaning verification?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
Observations: <i>No interior work was done</i>		
13.2	Exterior	
	Signs posted clearly defining the work area and warning occupants and others to remain outside the work area during the entire duration of the renovation?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	All doors and windows closed within 20 feet of renovation?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA ?
	Doors within work area used while job is being performed are covered to allow workers to pass while confining dust and debris to the work area?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
	Ground covered with plastic sheeting or impermeable material extends at least 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris (unless property line prevents 10 feet minimum)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Precautions taken to ensure that dust and debris do not contaminate other buildings, areas of the property or migrate to adjacent properties?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Waste from renovation activities contained to prevent the release of dust and debris before the waste is removed from the work area for storage or disposal? Chute covered if used to remove waste from the work area?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Waste stored under containment, in an enclosure, or behind a barrier that prevents release of and access to dust and debris at the conclusion of each work day or renovation?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA ?
	Waste contained during transport to prevent the release of dust and debris?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Work area cleaned until there is no dust, debris or residue?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All paint chips and debris collected and sealed in a heavy-duty bag?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Protective sheeting removed, misted before folding, folded dirty side in and either taped shut or sealed in a heavy-duty bag?	<input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA ?

Garage door in Twp. Door

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TEST KITS		
12.3	EPA recognized test kit used by certified renovator on effected components to determine if lead-based paint was present?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Is test kit documentation or copy available on site?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Was a false negative result for lead given as a result of using an unrecognized test kit?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Observations: <i>No certified renovator was contacted at the scene unknown if a lead test was done. He thinks it is lead so he doesn't test</i>	
RESTRICTED PRACTICES		
12.4	Was open-flame burning or torching of lead-based paint done during renovations?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Were machines that remove lead-based paint through high speed operations such as sanding, grinding, power planing, needle gun, abrasive blasting, or sand blasting without their accompanying shroud or point of origin containment system connected to HEPA exhaust control?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Were heat guns at temperatures above 1,100° F used on lead-based paint during renovation?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
	Observations:	
WORK PRACTICE STANDARDS		
13.1	Interior	
	Signs posted clearly defining the work area and warning occupants and others to remain outside the work area during the entire duration of the renovation?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Work area cleaned until there is no dust, debris or residue?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All objects removed from work area including furniture, rugs, and window coverings, or objects covered with plastic sheeting or impermeable material with all seams and edges taped or sealed?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All ducts openings in the work area closed and covered with taped-down plastic sheeting or impermeable material?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Windows and doors in the work area closed, covered with plastic sheeting or impermeable material, or when used as an entrance to the work area confines dust and debris to the work area and allows workers to pass through?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Doors within the work area that are used while the job is being performed covered with plastic sheeting or impermeable material in a manner that allows workers to pass through while confining dust and debris?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Floor surface covered with taped-down plastic sheeting or other impermeable material at least 6 feet beyond perimeter of renovation?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Waste from renovation activities contained to prevent the release of dust and debris before the waste is removed from the work area for storage or disposal? Chute covered if used to remove waste from the work area?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Waste stored under containment, in an enclosure, or behind a barrier that prevents release of and access to dust and debris at the conclusion of each work day or renovation?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Waste contained during transport to prevent the release of dust and debris?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All objects and surfaces in work area and within 2 feet of work area cleaned higher to lower?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	Walls in work area cleaned starting at ceiling and working down to floor by vacuuming with HEPA vacuum or wiping with damp cloth?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All remaining surfaces/objects in work area including furniture and fixtures vacuumed with HEPA vacuum or with HEPA vacuum equipped with beater-bar attachment for carpets, and rugs?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
	All remaining surfaces and objects in work area except carpeted or upholstered surfaces wiped	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

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		§745.84(b)(2).
<i>Information Distribution – Child-occupied Facility</i>		
	§745.84(c)(1)(i)	Failure to provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet pursuant to 40 CFR §745.84(c)(1)(i)
	§745.84(c)(1)(i)	Failure to obtain, from the owner of the building, a written acknowledgment that the owner has received the pamphlet, or failure to obtain a certificate of mailing at least 7 days prior to the renovation, pursuant to 40 CFR §745.84(c)(1)(i)
	§745.84(c)(1)(ii)	Failure to provide an adult representative of the child-occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility, pursuant to 40 CFR §745.84(c)(1)(ii)
	§745.84(c)(2)	Failure to provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians, pursuant to 40 CFR §745.84(c)(2)
<i>Interior Renovations</i>		
	§745.85(1)	Failure to post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until post-renovation cleaning verification have been completed, pursuant to 40 CFR §745.85(1).
	§745.85(a)(2)(i)(A)	Failure to remove all objects from the work area, including furniture, rugs, and window coverings, or cover them with a plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed, pursuant to 40 CFR §745.85(a)(2)(i)(A).
	§745.85(a)(2)(i)(B)	Failure to close and cover all ducts opening in the work area with taped-down plastic sheeting or other impermeable material before beginning the renovation, pursuant to 40 CFR §745.85(a)(2)(i)(B).
	§745.85(a)(2)(i)(C)	Failure to close windows and doors in the work area, cover doors with plastic sheeting or other impermeable material, and/or cover doors used as an entrance to the work with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area, pursuant to 40 CFR §745.85(a)(2)(i)(C).
	§745.85(a)(2)(i)(D)	Failure to cover the floor surface, including installed carpet, with taped-down plastic sheeting or other impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or sufficient distance to contain the dust, whichever is greater, before beginning the renovation pursuant to 40 CFR §745.85(a)(2)(i)(D).
	§745.85(a)(2)(i)(E)	Failure by the renovation firm to use precautions to ensure that all personnel, tools and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area, pursuant to 40 CFR §745.85(a)(2)(i)(E).
<i>Exterior Renovations</i>		
	§745.85(a)(2)(ii)(A)	Failure to close all doors and windows within 20 feet of the renovation, close all doors and windows within 20 feet of the renovation on the same floor as the renovation on multi-story buildings, and/or close all doors and windows on all floors below that are the same horizontal distance from the renovation before beginning the renovation, pursuant to 40 CFR §745.85(a)(2)(ii)(A).
	§745.85(a)(2)(ii)(B)	Failure to ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area before beginning the renovation, pursuant to 40 CFR

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	§745.85(a)(5)(ii)(B)	Failure to thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum and/or failure to use a HEPA vacuum equipped with a beater bar when vacuuming carpets and rugs, pursuant to 40 CFR §745.85(a)(5)(ii)(B).
	§745.85(a)(5)(ii)(C)	Failure to wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth and/or failure to mop uncarpeted floors thoroughly, using a mopping method that keeps the wash water separate from the rinse water, such as the 2-bucket mopping method, or using a wet mopping system, pursuant to 40 CFR §745.85(a)(5)(ii)(C).
<i>Record Keeping</i>		
	§745.85(b)(1)(i)	Failure to perform a visual inspection of the interior work area to determine whether dust, debris or residue is still present, to remove dust, debris or residue by re-cleaning if necessary, and/or perform another visual inspection, pursuant to 40 CFR §745.85(b)(1)(i).
	§745.85(b)(1)(ii)(A)	Failure by a renovator to verify that each interior windowsill in the work area has been adequately cleaned using a disposable cleaning cloth(s) compared to the cleaning verification card following the prescribed procedures, pursuant to 40 CFR §745.85 (b)(1)(ii) (A) or failure by a certified renovator to arrange for the collection dust clearance samples as part of optional dust clearance testing, pursuant to 40 CFR §745.85(b)(1)(ii)(A)
	§745.85(b)(1)(ii)(B)	Failure by a renovator to verify that each interior floor in the work area has been adequately cleaned using a disposable cleaning cloth(s) compared to the cleaning verification card following the prescribed procedures pursuant to 40 CFR §745.85 (b)(1)(ii) (B) or failure by a certified renovator to arrange for the collection dust clearance samples as part of optional dust clearance testing, pursuant to 40 CFR §745.85(b)(1)(ii)(B)
	§745.85(b)(1)(iii)	Failure by a renovator to wait until interior work area passes post-renovation cleaning verification before removing signs, pursuant to 40 CFR §745.85(b)(1)(iii)
<i>Exterior Visual Inspection</i>		
	§745.85(b)(2)	Failure by a renovator to perform a visual inspection of the exterior work area to determine whether dust, debris or residue is still present, to remove dust, debris or residue by re-cleaning if necessary, and/or perform another visual inspection, pursuant to 40 CFR §745.85(b)(2)
	§745.85(b)(2)	Failure by a renovator to wait until exterior work area passes visual inspection before removing signs, pursuant to 40 CFR §745.85(b)(2)
<i>Dust Clearance</i>		
	§745.85(c)	Failure to arrange the performance of optional dust clearance testing at the conclusion of the renovation if required to do so by the person contracting for the renovation, a Federal, State, Territorial, Tribal, or local law or regulation, pursuant to 40 CFR §745.85(c).
	§745.85(c)	Failure to have the optional dust clearance testing performed by a certified inspector, risk assessor, or dust sampling technician at the conclusion of the renovation, pursuant to 40 CFR §745.85(c).
	§745.85(c)(2)	Failure to have the optional dust clearance testing performed by a certified inspector, risk assessor or dust sampling technician at the conclusion of the renovation, pursuant to 40 CFR §745.85(c)(2)
	§745.85(c)(3)	Failure to re-clean the work area until dust clearance results are below clearance standards, pursuant to 40 CFR §745.85(c)(3).
	§745.86	Failure to retain all records necessary to demonstrate compliance with the residential property renovation for a period of 3 years following completion of the renovation activities pursuant to 40 CFR § 745.86.
	§745.88	Failure to use an EPA approved test kit, pursuant to 40 CFR §745.88 where the test kit result provided a false negative result for lead (i.e., no lead).
	§745.88	Failure to use an EPA approved test kit when determining the presence of lead, pursuant to 40 C.F.R. §745.88 where the test kit provided an accurate result for the presence of lead.
<i>General</i>		
	§745.89(b) or (c)	Failure of an individual to perform responsibilities for ensuring compliance with 40 CFR §745.85 at all renovations to which they are assigned, pursuant to 40

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ATTACHMENTS	
A	Notice of Inspection Form
B	Notice of Confidentiality Form
C	Copy of Firm Certification
D	Copy of Renovator Certificate(s)
E	Copy of Pre-renovation Education material receipt documentation
F	Copy of Renovate Right brochure used for the Pre-renovation Education Rule
G	Copy of Lead Safe Work Practices documentation
H	Copy of On the Job Training documentation
I	RRP lead-based paint test kit documentation or a copy of an example of the RRP lead-based paint test kit documentation
J	Written Statement
K	List of Compliance Assistance Materials provided to facility
L	Receipt for Documents
M	Photolog
N	Other (list/describe – e.g., business cards, blank contract, etc.)